

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States Courts
Southern District of Texas
FILED

February 18, 2022

United States of America
v.

Case No. C-22-00197M

Nathan Ochsner, Clerk of Court

Hector VASQUEZ GARCIA
Paublo RUEBEN

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2-16-2022 to 2-18-2022 in the county of Nueces in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 U.S.C. § 846

Offense Description

Conspiracy to possess with the intent to distribute a controlled substance in
Schedule II of the Controlled Substance Act of 1970, to wit; approximately
3.12 kilograms of methamphetamine and approximately 2.32 kilograms of
cocaine.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.Submitted by reliable electronic means, sworn to, signature
attested telephonically per Fed.R.Crim.P. 4.1, and probable
cause found:

Date: February 18, 2022

City and state: Corpus Christi, Texas

Ryan D. Boyce
Complainant's signature

Ryan D. Boyce, Special Agent

Printed name and title

Mitchel Neurock
Judge's signature

Mitchel Neurock, U.S. Magistrate Judge

Printed name and title

VASQUEZ GARCIA, Hector
RUEBEN, Pablo

ATTACHMENT "A"

On February 16, 2022, Special Agents (SA) from the Drug Enforcement Administration (DEA) obtained information regarding a narcotics load destined for Corpus Christi, Texas. The information indicated that this narcotics load would arrive in Corpus Christi, Texas, the following day and that the narcotics load would contain kilogram quantities of cocaine and methamphetamine. The information indicated that this cocaine and methamphetamine were set to be distributed to a buyer in Corpus Christi, Texas.

On February 17, 2022, agents obtained additional information about a red 2019 GMC truck containing two Hispanic males traveling to a McDonald's restaurant in Corpus Christi, Texas. Agents learned that the purpose of the two Hispanic males traveling to the McDonald's restaurant was to meet with the buyer of the kilograms of cocaine and methamphetamine to discuss the impending transaction.

Still on the same date, at approximately 6:05 p.m., surveilling agents observed as two Hispanic males, later identified as Hector VASQUEZ GARCIA and Pablo REUBEN, entered into the McDonald's restaurant and met with two additional Hispanic male subjects. This meeting between VASQUEZ GARCIA, REUBEN, and the two additional Hispanic male subjects inside the McDonald's restaurant was to discuss the sale of multiple kilograms of cocaine and methamphetamine. VASQUEZ GARCIA and REUBEN made it clear during this meeting that they and others had coordinated or brought cocaine and methamphetamine to Corpus Christi, Texas, and were ready to distribute the narcotics to the two Hispanic male subjects. At the table during the entirety of the conversation was an undercover agent working on behalf of the DEA. This undercover agent participated in lengthy negotiations with VASQUEZ GARCIA and REUBEN about receiving the kilograms of cocaine and methamphetamine from VASQUEZ GARCIA and REUBEN. The undercover agent indicated that VASQUEZ GARCIA appeared to be the drug trafficker who was in-charge between the two men.

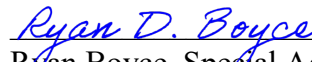
After the meeting inside the McDonald's restaurant, surveilling agents observed VASQUEZ GARCIA and REUBEN depart the McDonald's parking lot in the red 2019 GMC truck. Shortly thereafter, a traffic stop and a search of the red 2019 GMC truck was conducted with negative results. Intelligence during this time indicated that there may be a secondary vehicle in the general area that contained the kilograms of cocaine and methamphetamine. Through investigative means, agents identified this secondary vehicle as a 2016 Chevrolet Sonic registered to REUBEN. Agents found this vehicle parked and powered off inside the La Quinta Inn & Suites parking lot in Corpus Christi, Texas, nearby where the red 2019 GMC truck was traffic stopped. Agents then secured a federal search warrant to search the 2016 Chevrolet Sonic. Inside the 2016 Chevrolet Sonic agents discovered an aftermarket compartment. Inside this aftermarket compartment was approximately 3.12 kilograms of a crystal-like substance that field-tested positive for the presence of methamphetamine and approximately 2.32 kilograms of a white powdery substance that field-tested positive for the presence of cocaine. Based on training and experience, agents know these substances to be methamphetamine and cocaine, respectively.

At this time, both VASQUEZ GARCIA and REUBEN were placed under arrest. In a post-arrest interview, REUBEN admitted knowledge of the narcotics in the 2016 Chevrolet Sonic and told agents that he transported the narcotics to Corpus Christi, Texas, the same day for the purposes of being distributed.

VASQUEZ GARCIA denied knowledge of the narcotics inside the 2016 Chevrolet Sonic. Despite this declination of knowledge during his post-arrest statement, VASQUEZ GARCIA's statements and active participation in trafficking negotiations with REUBEN and the undercover agent for approximately three kilograms of methamphetamine and approximately two kilograms of cocaine, indicated that VASQUEZ GARCIA did know the methamphetamine and cocaine was inside the 2016 Chevrolet Sonic. VASQUEZ GARCIA, together with REUBEN, or others, intended to distribute the methamphetamine and cocaine in Corpus Christi, Texas. Moreover, during the post-arrest interview, VASQUEZ GARCIA granted consent to agents to search his cellular telephone. In this cellular telephone were text messages showing VASQUEZ GARCIA's active involvement in the multi-kilogram drug trafficking conspiracy.


On February 18, 2022, DEA Special Agent Ryan Boyce contacted Assistant United States Attorney (AUSA) Reid Manning who authorized federal prosecution of VASQUEZ GARCIA and REUBEN for conspiracies involving methamphetamine and cocaine.

From the amount of tangible methamphetamine and cocaine included in this conspiracy; I infer that the methamphetamine and cocaine was possessed with the intent to distribute.



Ryan Boyce, Special Agent
Drug Enforcement Administration

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P. 4.1, and probable cause found: on February 18, 2022:



Mitchel Neurock
United States Magistrate Judge